

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SEALED

UNITED STATES OF AMERICA

v.

JESUS ROJAS,

Defendant

) Criminal No. 19Cr10112
)
)
) Violations:
)
) Count One: Distribution of and Possession with
) Intent to Distribute Fentanyl
) (21 U.S.C. § 841(a)(1))
)
) Count Two: Possession with Intent to
) Distribute 40 Grams or More of Fentanyl
) (21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(vi))
)
) Forfeiture Allegation:
) (21 U.S.C. § 853)
)

INDICTMENT

COUNT ONE

Distribution of and Possession with Intent to Distribute Fentanyl
(21 U.S.C. § 841(a)(1))

The Grand Jury charges that:

On or about February 11, 2019, in Haverhill, in the District of Massachusetts, the
defendant,

JESUS ROJAS,

did knowingly and intentionally distribute and possess with intent to distribute a mixture and
substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl]
propanamide, also known as fentanyl, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWO

Possession with Intent to Distribute
40 Grams or More of Fentanyl
(21 U.S.C. §§ 841(a)(1) and (b)(1)(B)(vi))

The Grand Jury further charges that:

On or about February 22, 2019, in Lawrence, in the District of Massachusetts, the
defendant,

JESUS ROJAS,

did knowingly and intentionally possess with intent to distribute 40 grams or more of a mixture
and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl]
propanamide, also known as fentanyl, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(vi).

DRUG FORFEITURE ALLEGATION
(21 U.S.C. § 853)

1. Upon conviction of one or more of the offenses in violation of Title 21, United States Code, Section 841, set forth in Counts One through Two of this Indictment, the defendant,

JESUS ROJAS,

shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offenses; and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses.

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 21, United States Code, Section 853, as a result of any act or omission of the defendants --

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;


it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property described in Paragraph 1 above.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL

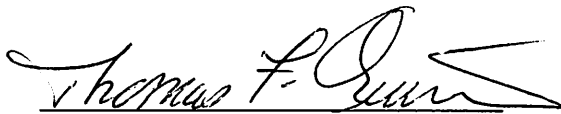


FOREPERSON



PHILIP C. CHENG
ASSISTANT UNITED STATES ATTORNEY
DISTRICT OF MASSACHUSETTS

District of Massachusetts: April 3, 2019
Returned into the District Court by the Grand Jurors and filed.



DEPUTY CLERK 4/3/2019 @ 1:08pm